

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JEAN OSMON, <sup>1</sup>	)	
	)	
Petitioner	)	
	)	Civil Action No.
v.	)	05cv10771-PBS
	)	
Joseph McDonough, et al.	)	
	)	
Respondents	)	

SECOND NOTICE OF CHANGE IN PLACE OF DETENTION

Respondent<sup>2</sup> notifies the Court of a change of place of petitioner's detention. Petitioner's place of detention is now:

**Plymouth County Correctional Facility**  
**26 Long Pond Road**  
**Plymouth, Massachusetts 02360**

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<sup>1</sup> Petitioner's name as appearing on his Petition and in respondent's files is **Osmon JEAN**, not Jean Osmon. Respondent moves for correction of the case caption, with the Court's permission.

<sup>2</sup> The responsive official of the Department of Homeland Security responsible for enforcement of petitioner's removal order in the instant action is Bruce Chadbourne, Field Office Director for Detention and Removal, Department of Homeland Security, Bureau of Immigration and Customs Enforcement ("ICE") in Boston, Massachusetts. See 28 U.S.C. § 517 (providing for the appearance of the Department of Justice "to attend to the interests of the United States in a suit pending in a court of the United States").

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: s/Frank Crowley  
FRANK CROWLEY  
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Certification Under L.R. 7.1(A)(2)

Respondent respectfully takes the position that because the petitioner is pro se and detained in a State or Federal facility, the requirement of L.R. 7.1(A)(2) regarding counsels' certification of resolution efforts is inapplicable. Alternatively, because petitioner is a pro se alien currently incarcerated in a state correctional facility, counsel for the respondent respectfully requests leave to file this Motion without a 7.1 conference.

CERTIFICATE OF SERVICE

I hereby certify that I caused true copy of the above document to be served upon pro se petitioner by mail on June 22, 2005.

s/Frank Crowley  
FRANK CROWLEY  
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